UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
WC-15J

NOV 2 1 2017

CERTIFIED MAIL 7017 0660 0000 8908
RETURN RECEIPT REQUESTED

Ex. 6. (Personal Privacy)
Facility Owner, FOIA Ex. 6 (Personal Priacy) Farms
FOIA Ex. 6 (Personal Priacy)
Maria Stein, OH 45860

Subject: August 29, 2017 Compliance Evaluation Inspection

Dear Ex. 6. (Personal Privacy)

Enclosed, please find a copy of the U.S. Environmental Protection Agency Inspection Report for the Animal Feeding Operation inspection conducted at FOIA Ex. 6 (Personal Priacy) Farms on August 29, 2017. The purpose of the inspection was to evaluate and document compliance of the FOIA Ex. 6 (Personal Priacy) Farms with the Clean Water Act.

During the inspection, EPA noted areas of concern. Specifically, see numbers 1-4 on page twelve of the enclosed inspection report. EPA requests that you provide the following information with respect to these areas of concern:

1. Within 30 calendar days, please provide information on how you plan to address managing the necessary free board in the Lagoon and installing a depth marker in the Lagoon.
2. Within 30 calendar days, please provide information on how you plan to address haylage and silage spills from open haylage and silage bags that have the potential to reach the drainage ditch on the east of the production area.

Should you find anything in the report that you disagree with, please provide a detailed response within thirty (30) calendar days.

Thank you for your prompt attention to this matter. If you have any questions, please contact Andi Hodaj of my staff at (312) 353-4645 or at hodaj.andi@epa.gov.

Sincerely,

Michelle Heger,
Acting Chief, Section 1
Water Enforcement and Compliance Assurance Branch

Enclosures

CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose: Compliance Evaluation Inspection

Facility: FOIA Ex. 6 (Personal Priacy) Farms
FOIA Ex. 6OIA Ex. 6 (Personal (Personal riacy) Road
Maria Stein, OH 45860
FOIA Ex. 6 (Personal Priacy)

NPDES Permit Number: N/A

Date of Inspection: 8/29/2017

EPA Representatives:
Andi Hodaj, Environmental Engineer, 312-353-4645, hodaj.andi@epa.gov
Joan Rogers, Environmental Scientist, 312 -886-2785, rogers.joan@epa.gov

State Representatives:
None

Facility Representatives:
Ex. 6. (Personal Privacy)

Report Prepared by:
Andi Hodaj, Environmental Engineer
Water Enforcement and Compliance Assurance Branch, Section 1

Report Date: 09/07/2017

Inspector Signature: _____

Signature Date: 11/15/2017

Approver Name, Title, and Signature: _____ Michelle Heger, Acting Chief, Section 1

Approval Date: 11/19/17

1. BACKGROUND

The purpose of this report is to describe, evaluate and document the FOIA Ex. 6 (Personal Priacy) Farms' compliance with the Clean Water Act (CWA) during an EPA compliance inspection at its Maria Stein, Ohio facility on August 29, 2017. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

According to Ex. 6. (Personal Privacy) the total size of the production area is approximately 10 acres. No crops, vegetation, or forage growth are sustained over any portion of the production area. In addition, no acreage is devoted to pasture. At the time of the inspection, Ex. 6. (Personal Privacy) stated that there were approximately 510 animals onsite, which is capacity for the farm, and includes 300 dairy cows, 100 calves and 110 heifers. The type of confinement is freestall. Currently, the facility is considered a medium Animal Feeding Operation (AFO) based on the number of mature dairy cows at the facility.

A drainage ditch flows north along the eastern edge of the dairy's production area. This drainage ditch flows north for approximately ¼ of a mile until it discharges into Montezuma Creek. Montezuma Creek flows north for approximately 4.5 miles and discharges into Beaver Creek. Beaver Creek flows north for approximately 2 miles before discharging into Grand Lake St. Mary. According to the ground slope observed during the inspection, surface water runoff from the production area flows towards the drainage ditch for all areas east of the barns and south towards a corn field for the area between the barns and FOIA Ex. 6 (Personal Priacy) Road (see Attachment 1).

The farm has no records of prior violations by U.S. EPA or Ohio EPA.

2. SITE INSPECTION

Table 1: Site Entry

Arrival Time:	9 a.m.
Temperature:	65 °F
Precipitation:	1.3 inches (the night before the inspection)
Presented credentials?	Yes
Credentials presented to whom and at what time?	9 a.m. to Randy FOIA Ex. 6 (Personal Priacy)
EPA vehicle parked in approved location?	Yes
Location where EPA vehicle was parked?	Next to Calves 1 Barn.
Disposable boots worn?	Yes
Other bio-security measures taken:	None, but the EPA vehicle was washed after the inspection.

2.1 Records Review (The following Records Review tables reflect information provided before the walk-through of the facility, unless otherwise noted.)

Table 2: Documents

Checklist(s) Used	
R5 Concentrated Animal Feeding Operation (CAFO) Boilerplate Inspection Report	
Facility Documents Reviewed:	
Comprehensive Nutrient Management Plan (CNMP) Soil analysis records Manure analysis records	
If photographs or documents were taken, does the facility consider any to be Confidential Business Information (CBI)?	No
Which information does the facility consider to be CBI?	None

Table 3: Facility Description

Type of Animal	**Number of Animals**	**Capacity**	**Type of Confinement**
Mature dairy cows	320 (milking+dry)	At capacity	Freestall
Calves	100	At capacity	Freestall
Heifers	110	At capacity	Freestall
Minimum Number of Animals in previous 5 years:			250
Maximum Number of Animals in previous 5 years:			530
Number of Animals that are stabled/confined and/or fed/maintained for 45 days or more in previous 12 months:			530
Amount of Liquid Manure Generated per year:			3,000,000 gallons
Amount of Solid Manure Generated per year:			232 tons
Does the facility have an NPDES Permit?			No
SIC or NAICS code:			0241
CAFO Designation/Defined Date (If a designated CAFO)			N/A
CAFO Designation/Defined Reason (If a designated CAFO)			N/A
Do animals have direct access to WOUS?			No
Are crops, vegetation, forage growth, or post-harvest residues sustained in the normal growing season over any portion of the lot or facility where animals are kept?			No
What is the area (acres) of the production area?			10
What is the area (acres) of the pasture?			N/A
How many employees (not counting family members)?			None

Other facilities under common ownership (name and address):
Hog barn, 1000 head on Clunestucke Road, approximately 1 mile away from the dairy facility.
The facility does not share equipment or manure with the other facilities, although [redacted] stated that if the lagoon in the dairy facility gets full, he will consider moving some of the manure to one of his other facilities.

Table 4: Livestock Waste Storage

Type of Storage	Storage Capacity	Type of Liner	Depth Markers Present	Last Time Waste was Removed	Amount of Waste Removed	Days of Storage
Pond	3,000,000 gallons	Clay	No	7/12/2017	500,000 gallons	270

Records at site of storage structure design?	No records. According to [redacted] it was built in 1992 and upgraded in 2000.
Is manure stored for the short term? If yes, describe where it is stored, how it is drained and where it drains to.	No. Solids are pressed out and liquids go to the lagoon.
Are records kept of the level of manure in the storage structures?	No.
When was the last time a storage structure was emptied, either partially or completely?	7/12/2017
What amount of manure or process wastewater was removed the last time the storage structure was emptied, either partially or completely?	500,000 gallons
Do the facility personnel inspect and keep records of all diversion devices?	Facility personnel inspect diversion devices, but they do not keep records.
Do the facility personnel inspect and keep records of all impoundments?	Facility personnel inspect impoundments, but they do not keep records.
Do the facility personnel inspect and keep records of all the water lines?	Facility personnel inspect water lines, but they do not keep records.
Do the facility personnel perform routine visual inspections and keep records of the production area?	Facility personnel inspect the production area, but they do not keep records.
Does the waste storage system have a managed outfall or discharge point?	No
Has the facility had any documented discharges of livestock waste to surface water in the past year?	No
Are there safety devices installed around any manure storage ponds?	No

Describe where water comes from that is used to clean and/or flush.
The farm uses well water.
Describe the way feed is contained and how runoff from feed is collected and disposed of at the facility:
Feed for animals is contained in silo and grain bins, and in silage and haylage bags. Runoff from the silo and grain bins goes toward the lagoon while runoff from haylage and silage bags pools around the bags.
If a dairy, describe how process wastewater from the plate cooler water is collected and disposed of at the facility:
Plate cooler water is collected in a tank located on the northeast side of the Dairy Cow Barn and from there is fed to the waterers.
If a dairy, describe how process wastewater from the cleaning of the milking parlor is collected and disposed of at the facility:
Floor drains collect process wastewater from the cleaning of the milking parlor. From there, the water drains into the main lagoon through underground pipes.
If a dairy, describe how process wastewater from the cleaning of the milk tanks is disposed of at the facility:
Floor drains collect process wastewater from the cleaning of the milk tanks. From there, the water drains into the main lagoon through underground pipes.

If a dairy, how many times per day are cows milked?	3

Table 6: Land Application and Disposal of Manure and Process Wastewater

Does the facility perform and keep records of the manure testing?	Yes
When was the last time a sample was taken of the manure and/or process wastewater?	3 years ago. Next one will be this fall.
Describe the process to take the manure and/or process wastewater sample.	Agitate the Lagoon before the sample is taken. Sample is analyzed at Brookside Labs located at 200 White Mountain Dr, New Bremen, OH 45869
Number of acres available for land application:	1000
Are land application records kept?	Yes
Who applies the manure and process wastewater to the fields?	Diller Pumping LLC
Are weather conditions at time of application kept? (24 before – 24 after)	Yes
Does the facility perform and keep records of the soil testing?	Yes
Is manure transferred off-site to another party?	No
Are manure transfer records maintained?	N/A

Additional Information:	None

Table 5: Livestock Waste Management

Describe the way manure is collected and disposed of at the facility:	
The facility has four freestall barns (Dairy Cows, Calves 1, Calves 2 and Heifers) which provide total confinement under roof for the cows. The Dairy Cow Barn also houses the milking equipment and tanks. In the Dairy Cow Barn, where there were 300 dairy cows at the time of inspection, manure is scrapped to a manure pressing barn. Liquid manure from the manure press goes to an underground reception pit on the north side of the barn and is then pumped into the lagoon. The reception pit has a storage capacity of 45,000 gallons according to Ex. 6. (Personal Privacy) Solid manure that results from the pressing is hauled or re-used for bedding. Manure and bedding from the other barns is scrapped and pushed towards the lagoon. According to Ex. 6. (Personal Privacy) manure from the lagoon is pumped twice per year. The farm uses the contractor Diller Pumping LLC for hauling manure in the 1000 acres owned by the FOIA Ex. 6 (Personal Priacy) Farms.	
Describe the way used bedding is collected and disposed of at the facility:	
Bedding from the Dairy Cow Barn is scrapped and hauled daily for land applications. Bedding from the other barns is scrapped and pushed towards the lagoon.	
Are mortality records kept?	No
Describe the way mortalities are managed at the facility:	
When mortalities occur, calves are composted on site. Other animals are rendered by an outside rendering company.	
What type of method is used to provide drinking water for the animals?	Drinkers with fountains.
Describe the way spilled drinking water is collected and disposed of at the facility:	
Floor drains collect spilled drinking water. From there, the water drains along with manure into the main lagoon through underground pipes.	
Describe the way mist cooling water is collected and disposed of at the facility:	
Floor drains collect mist cooling water. From there, the water drains along with manure into the main lagoon through underground pipes.	
Describe how chemicals are stored and how used or spilled chemicals are collected and disposed of at the facility:	
Chemicals are stored in plastic containers in the Dairy Cows barn, next to the milking area. Spilled Chemicals drain into the floor drains and from there along with manure is drained into the main Lagoon through underground pipes.	
Describe the way water that has been used to wash/flush barns is collected and disposed of at the facility:	
N/A	

Do facility personnel perform periodic inspection of land application equipment?	N/A

Table 7: Receiving Surface Waters

Describe the surface flow pathways:	
A drainage ditch flows north along the eastern edge of the dairy's production area. This drainage ditch flows north for approximately ¼ of a mile until it discharges into Montezuma Creek. Montezuma Creek flows north for approximately 4.5 miles and discharges into Beaver Creek. Beaver Creek flows north for approximately 2 miles before discharging into Grand Lake St. Mary. According to the ground slope observed during the inspection, surface water runoff from the production area flows towards the drainage ditch for all areas east of the barns, and south towards a corn field for the area between the barns and FOIA Ex. 6 (Personal Priacy) Road (see Attachment 1).	
How many months out of the year is there flow in the nearest surface water pathway:	8-10
Are there any storm water pathways entering the facility?	No
Are there any clean water ponds on site?	No
What is the name of the first waterway that is identified as a Traditional Navigable Water (TNW) for surface flow from the facility?	Grand Lake Saint Mary
Is the surface water pathway nearest to the facility considered to be ephemeral, intermittent or perennial?	Intermittent
Has the surface water pathway nearest to the facility been assessed for water quality?	No

Table 8: Nutrient Management Plan

NMP on site?	Yes, the farm uses a CNMP.
Date NMP Submitted:	2011
Planner Name/Company:	Soil & Water Conservation District, Mercer Co.
Date that the NMP was last updated:	2014
Storage Description:	Outside prefab liquid storage (lagoon).
Amount of Manure Generated:	2,229,544 gallons
Capacity of Storage:	3,000,000 gallons
Duration of Storage:	491
Amount of Spreadable Land:	1000 acres
Mortality Management Plan:	Yes
Clean Water Diversion System:	Yes
Direct Contact Prevention Plan:	Yes
Chemical Management Plan:	Yes

Conservation Practices:	Yes
Manure Testing Protocols:	Yes
Soil Testing Protocols:	Yes
Land Application Protocols:	Yes
Additional NMP comments:	The maps have visible restriction features and clearly identifiable field locations.
Does the NMP reflect the current operational characteristics?	Not determined.
Are the number of acres owned/leased consistent with what is listed in the NMP?	Not determined.

Table 9: Land Application Records (details of the records reviewed)

Fields available for application this year:	Not reviewed.
Timing limitation on fields:	No winter application.
Annual manure analysis for N and P	No, the farm analyses for nitrogen and phosphorous every 3 years.
Soil tests for fields (for P) less than 5 years old?	Yes
Inspection of land application equipment documentation:	N/A
Crop:	Corn, soybean, wheat, and alfalfa.
Application Rate:	Not reviewed.
Crop Yield Goals:	Not reviewed.
Timing of land application:	Not reviewed.
Method of land application:	Not reviewed.
Additional land application information:	None

Table 10: Facility Records (details of the records reviewed)

Diversion devices:	No records on site.
Impoundments:	No records on site.
Depth marker observations:	No records on site.
Water Lines:	No records on site.
Mortality handling:	No records on site.
Storage Structure Design:	No records on site.
Overflow records:	No records on site.
Crop Yields:	No records on site.
Land Application Dates:	No records on site.
Weather Conditions at time of application (24 before-24 after):	No records on site.
Test Methods for Manure Testing:	No records on site.
Test Methods for Soil Testing:	No records on site.
Manure Test Results:	EPA reviewed manure sample analysis results contained in the CNMP from

	multiple ponds. The facility's CNMP included other operations owned by Mr. FOIA Ex. 6 (Personal Priacy) and manure holding ponds from which manure is tested, shown in photograph 1. Only the "Home Pond" from that list is on the facility described in this report and is referred to as Lagoon throughout this inspection report.
Soil Test Results:	We reviewed some of the soil test results from fields contained in the CNMP for years 2006 – 2015.
Calculations of N and P applied:	No records on site.
Application Methods:	Not reviewed.
Application Equipment Inspection Dates:	No records on site.

Table 11: NPDES Permit
N/A. The farm does not have a NPDES permit.

2.2 Walkthrough of the Facility

All photographs taken on the inspection are logged in Attachment 2 to this report. First, EPA took photos of the CNMP that Ex. 6. (Personal Privacy) keeps in the main office of the Calves 1 Barn (see photographs 1-3). The walkthrough of the facility started at the Calves 1 Barn and ended at the Calves 1 Barn (see Attachment 3). EPA observed small amounts of water on the ground throughout the production area. Ex. 6. (Personal Privacy) stated that approximately 1.3 inches of rain fell the previous night according to the rain gauge on site. As we walked north from the west side of the Calves 1 Barn, we observed that the area was being paved with a mixture of gravel and asphalt/tar chips (see photographs 5 and 6). Ex. 6. (Personal Privacy) stated that he plans to pave the entire area west of the barns. North of the Calves 1 Barn, we viewed the Commodity Barn where wet distilled grains and bean meal are stored. We observed some spillage of the feed and commodities out of the barn (see photograph 4). The ground slopes south from this area towards the corn field.

Walking further north, we viewed a roofed concrete corral area between the Calves 2 Barn and the Heifers Barn. We observed manure, process wastewater, and piles of feed and bedding outside the barn doors (see photographs 7-10). According to Ex. 6. (Personal Privacy) this concrete corral area drains towards the lagoon. Water from the downspouts that were recently placed on all the barns drained to the adjacent drainage ditch (see photograph 49).

Walking back south and around the silo bins, we noticed some feed spillage under the silo bins (see photograph 11). The ground slope in this area is towards the concrete pad in the corral area and ultimately towards the lagoon. We observed feed spilled below and around the silo and grain bins next to the Old Barn as well as in front of the garage (see photograph 12). This area ultimately drains north and then east towards the lagoon and the drainage ditch (see photographs 13 and 14). Between the Old Barn and the Heifers Barn, we viewed an open fenced concrete area that was sloped towards the corral that ultimately drains to the lagoon (see photograph 15).

Walking east between the Heifers Barn and the Hay Barn we observed two plastic tanks, which Ex. 6. (Personal Privacy) stated contained fertilizer solution. Next, we observed hay bales outside of the Hay Barn with water on the ground around them (see photograph 16). The slope of this area indicates that the area drains east/southeast towards the ditch and the lagoon.

Then, we walked further east towards the lagoon. On the east side of the Heifers Barn, we viewed a fenced concrete pad where the scraped manure is pushed towards the lagoon (see photograph 17). The level of manure in the lagoon was close to the top, (see photographs 18-21, 25, and 26) and had about 5-6 inches of freeboard in it. Ex. 6. (Personal Privacy) stated that if he cannot get the manure on the fields before the next rain event, he could haul some manure from the lagoon to another pond on one of his other operations. The lagoon does not have a depth marker and Ex. 6. (Personal Privacy) said that they visually inspect the depth as needed. Ex. 6. (Personal Privacy) Ex. 6. (Personal Privacy) stated that there had not been any recorded spills from the lagoon. The lagoon did not have safety devices installed, however, Ex. 6. (Personal Privacy) stated that he plans to install one.

EPA observed three rows of haylage bags between the lagoon and the drainage ditch (see photographs 22, 28, 40, and 41). Two of the bags were open to precipitation and process wastewater. Based on the topography, this area drains toward the ditch (see photographs 42 and 43). During the inspection, no process wastewater was flowing from the haylage bags towards the ditch. The drainage ditch was covered in vegetation at the time of the inspection and we observed a small amount of flow and a depth of water of approximately 0.5 ft in it at the time of the inspection (see photographs 23 and 24).

Near the haylage bags and on the east side of the Dairy Cow Barn, we observed three silage bags (see photographs 27 and 28). Ex. 6. (Personal Privacy) stated these bags had recently been filled. We observed silage on the ground (see photograph 29) and browned/yellow vegetation around them. Ex. 6. (Personal Privacy) stated that the vegetation was discolored because of a gas coming out of the silage bags that would burn and discolor the vegetation around them. Based on our observations of the topography in this area, it drains towards the ditch.

We walked southwest from the silage bags on the north side of the Dairy Cow Barn where a tank that stored water from the plate coolers was located (Attachment 2, photograph 30), there was a manure press barn that separated manure solids from the liquid manure received from the Dairy Cows Barn (Attachment 2, photographs 31, 32). Liquid manure from the Manure Press Barn, went into an underground reception pit (see photographs 34 and 37) before being pumped to the lagoon. Ex. 6. (Personal Privacy) stated that the reception pit's capacity is approximately 45,000 gallons. Solids from the manure press are transported on a belt to the Composting Barn (see photographs 35-37 and 39). At the time of the inspection, the manure press was turned off because manure had flowed out of the Press Barn when the lagoon reached a level where the manure could not flow to it anymore. Ex. 6. (Personal Privacy) explained that once that happened, the pit in the Manure pPress Barn overflowed, and manure and process wastewater flowed out of the press barn door (see photograph 31). Additionally, some spillage had occurred from the solids belt and the accumulation of solids on the side of the barn was open to precipitation and susceptible to runoff (Attachment 2, photographs 35, 36, 39). Runoff from this area would flow towards the Lagoon (Attachment 2, photographs 33, 38). South of the production area and next to the drainage ditch there were also some wheat bags and a couple of the bags were open and exposed to precipitation (Attachment 2, photographs 44-46).

On the east end of the Dairy Cow Barn, we observed a pile of leftover silage from the Dairy Barn (see photographs 47 and 48). In this area, the ground slopes from the leftover silage pile towards the drainage ditch.

Milking is performed in the Dairy Cow Barn via a robotic system (see photographs 50-76). Any manure or process wastewater from this area flows to the floor drains and ultimately to the lagoon. The chemical (teat dip pipeline acid/soap and brush cleaner) storage area is adjacent to the milking area and any spilled chemicals from this area would also flow into the floor drain and to the lagoon (see photographs 77 and 78). Outside and south of the Dairy Cow Barn, we observed two silo bins with "treats" for the milking cows which did not have spilled feed on the day of the inspection (see photographs 79 and 80).

We walked west towards FOIA Ex. 6 (Personal Priacy) Road and saw two silage bags with water on the ground around them (see photographs 82-85). The ground in this area slopes to the south towards the adjacent corn field. At this point, Ex. 6. (Personal Privacy) stated that after talking to Natural Resources Conservation Service (NRCS) people, he was thinking of constructing a grassed waterway that would convey runoff from this area to the drainage ditch along the east end of the production area. We explained to him that this would create a man-made conveyance for manure and process wastewater to reach the drainage ditch. As a medium AFO, the creation of a man-made conveyance that conveyed manure or process wastewater would cause the facility to be considered a CAFO.

At the open end of the Silage bags, we again observed some brown/yellow gas coming out of the bags and took two videos of the gas (see photographs 88-92). We then walked to the composting barn where some of the solids from the barn were open to precipitation and could generate runoff of manure or process wastewater (see photographs 93-97). The walkthrough ended at the Calves 1 Barn where the milking tanks are located (see photographs 98-100). Any spilled process wastewater from this area collects in the floor drains and ultimately drains to the lagoon.

EPA provided a closing conference to Ex. 6. (Personal Privacy) at 12 p.m. in the main office.

2.3 Closing Conference and Post-Inspection

Table 12: Post Walk-Through

Were specific "Areas of Concern" discussed with facility personnel?	Yes
Who were the Areas of Concern discussed with?	
Ex. 6. (Personal Privacy)	
Compliance assistance materials given to facility personnel:	
EPA's Beneficial Uses of Manure and Environmental Protection NRCS's EQIP Brochure NRCS's Most Common Conservation Practices for Confined Livestock EPA's CAFO Final Rulemaking – Fact Sheet EPA's Small Business Resources Information Sheet	
Exit Time:	12:30 p.m.
Disposable Boots Left at Facility?	Yes
Vehicle Washed after leaving facility?	Yes
Date and Time that vehicle was washed:	September 1, 2017 at approximately 7:00 a.m.

Table 14a: Sampling Information

Were samples taken?	No

3. AREAS OF CONCERN

EPA observed the following areas of concern whereby pollutants have the potential to reach waters of the United States:

1. Lagoon only had 5-6 inches of free board left. According to the Ohio Administrative Code»901:10 Livestock Environmental Permitting » Chapter 901:10-2 Permits; Management Plans, free board should be at least 1 foot. See photographs 18-21 in Attachment 2.
2. Lagoon does not have a depth marker.
3. Open haylage and silage bags stored in an area sloped towards and close to the drainage ditch. See photographs 27, 28, and 42-46 in Attachment 2.
4. Open pile of leftover (uneaten) feed on the ground on the east side of the Dairy Cow Barn which is sloped towards the drainage ditch. See photographs 47 and 48 in Attachment 2.

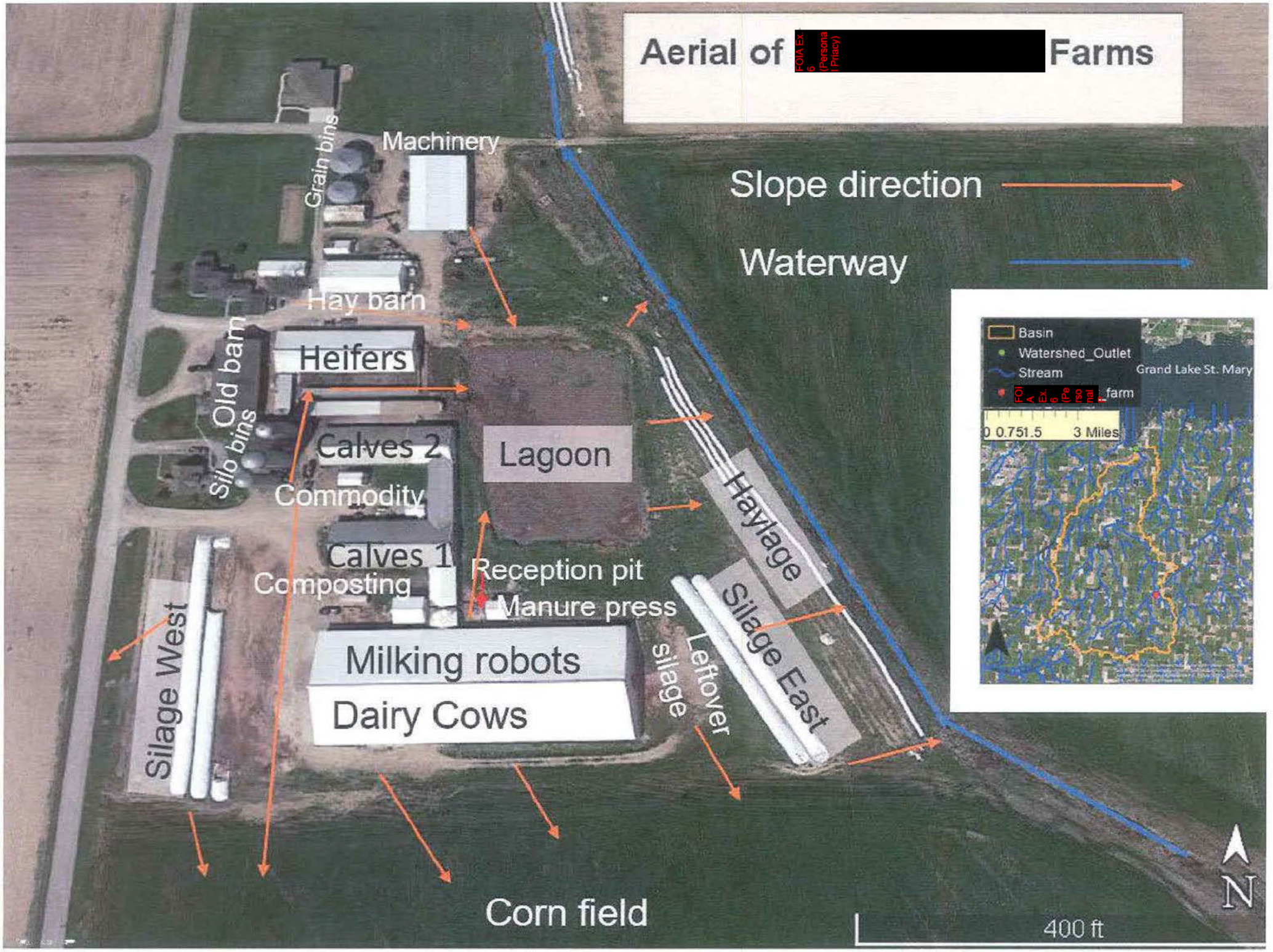
4. LIST OF DOCUMENTS RECEIVED FROM FACILITY

No documents were received from the facility.

5. ATTACHMENTS

1. Aerial depiction of the production area
2. Photolog
3. Inspection walkthrough diagram

Attachment 1


Aerial of FOIA Ex. 6 (Personal Piracy) Farms
Machinery
Grain bins
Slope direction
Waterway
Hay barn
Old barn
Silo bins
Heifers
Calves 2
Commodity
Lagoon
Haylage
Calves 1
Composting
Reception pit
Manure press
Silage East
Leftover silage
Silage West
Milking robots
Dairy Cows
Corn field
Basin
Watershed_Outlet
Stream
FOIA Ex. 6 (Personal ... farm
Grand Lake St. Mary
0 0.751.5 3 Miles
N
400 ft

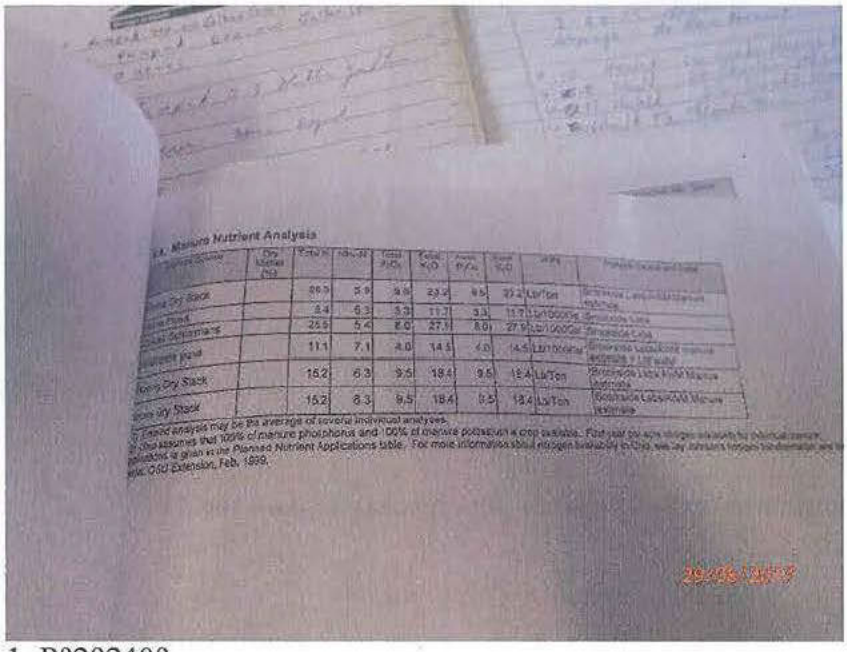
Attachment 2

FOIA Ex. 6 (Personal Priacy) **Farms**

EPA Inspection 8/29/2017

All photos taken by Joan Rogers, Environmental Scientist, U.S. EPA

Camera: Olympus TG-4



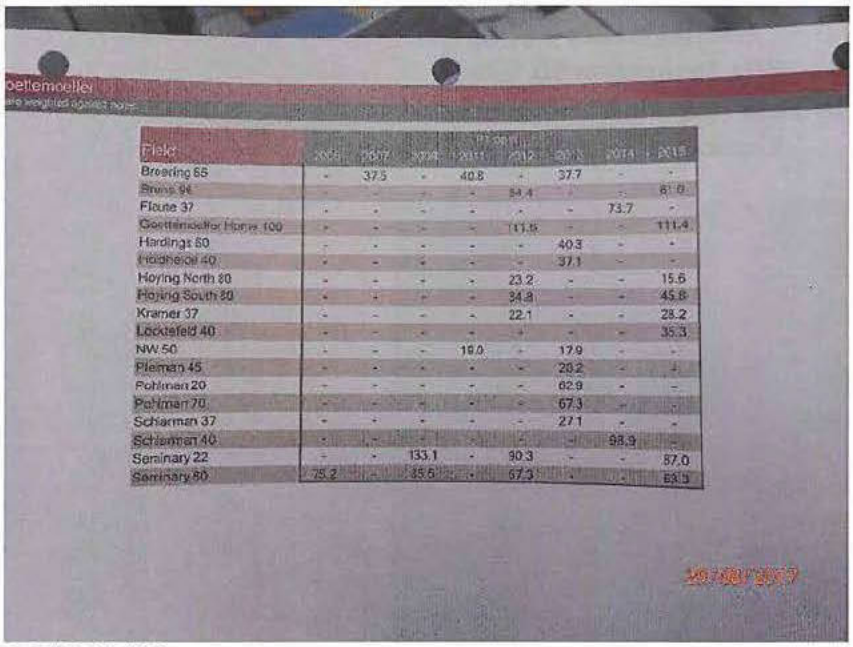
1: P8292408

Description: Sample of manure analysis results from records kept on site.

Location: Main office.

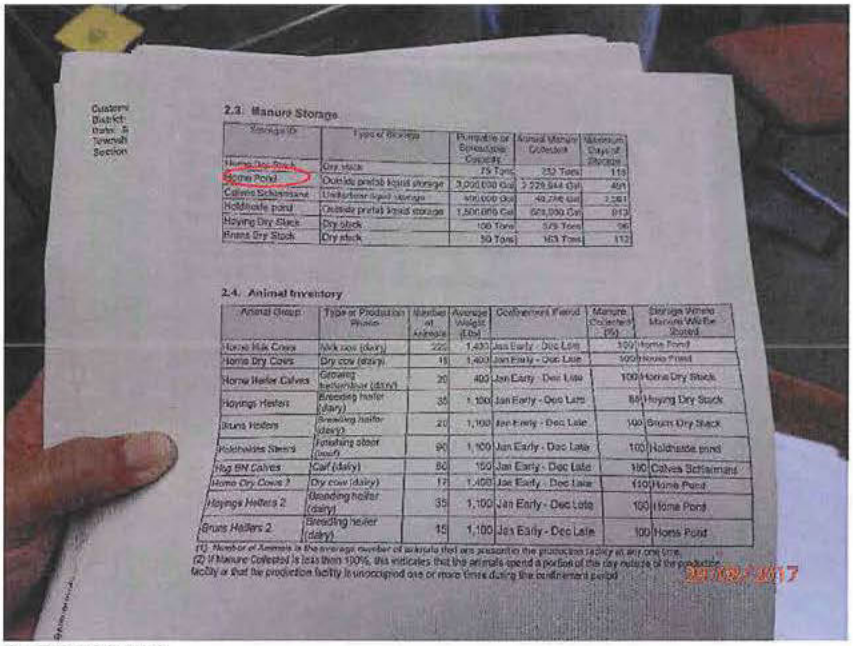
Camera Direction: Down.

Date/Time: 8/29/2017/9:58am



Field	2006	2007	2008	2011	2012	2013	2014	2015
Breeding 65	-	37.5	-	40.8	-	37.7	-	-
Brens 94	-	-	-	-	84.4	-	-	81.0
Floure 37	-	-	-	-	-	-	73.7	-
Gerttemoeller Home 100	-	-	-	-	111.5	-	-	111.4
Hardings 80	-	-	-	-	-	40.3	-	-
Holdheidel 40	-	-	-	-	-	37.1	-	-
Hoying North 80	-	-	-	-	23.2	-	-	15.6
Hoying South 80	-	-	-	-	34.8	-	-	45.8
Kramer 37	-	-	-	-	22.1	-	-	28.2
Locktefeld 40	-	-	-	-	-	-	-	35.3
NW 50	-	-	-	19.0	-	17.9	-	-
Pleiman 45	-	-	-	-	-	20.2	-	-
Pohlman 20	-	-	-	-	-	62.9	-	-
Pohlman 70	-	-	-	-	-	67.3	-	-
Schlarman 37	-	-	-	-	-	27.1	-	-
Schlarman 40	-	-	-	-	-	-	98.9	-
Seminary 22	-	-	133.1	-	90.3	-	-	87.0
Seminary 60	75.2	-	35.6	-	67.3	-	-	69.5

2: P8292409
Description: Sample of soil phosphorus analysis results from records kept on site.
Location: Main office
Camera Direction: Down.
Date/Time: 8/29/2017/10:05am



2.3. Manure Storage

Storage ID	Type of Storage	Purpose or Operational Capacity	Annual Manure Collected	Minimum Days of Storage
Home Dry Stock	Dry stock	75 Tons	252 Tons	110
Home Pond	Outside prefab liquid storage	3,000,000 Gal	3,228,944 Gal	401
Calves Schlarmans	Underfloor liquid storage	400,000 Gal	49,296 Gal	2,961
Holdheide pond	Outside prefab liquid storage	1,500,000 Gal	603,000 Gal	913
Hoying Dry Stock	Dry stock	100 Tons	379 Tons	96
Brens Dry Stock	Dry stock	50 Tons	163 Tons	112

2.4. Animal Inventory

Animal Group	Type or Production Phase	Number of Animals	Average Weight (Lbs)	Confinement Period	Manure Collected (%)	Storage Where Manure Will Be Stored
Home Milk Cows	Milk cow (dairy)	220	1,400	Jan Early - Dec Late	100	Home Pond
Home Dry Cows	Dry cow (dairy)	15	1,400	Jan Early - Dec Late	100	Home Pond
Home Heifer Calves	Growing heifer/bull (dairy)	20	400	Jan Early - Dec Late	100	Home Dry Stock
Hoyings Heifers	Breeding heifer (dairy)	35	1,100	Jan Early - Dec Late	80	Hoying Dry Stock
Bruns Heifers	Breeding heifer (dairy)	20	1,100	Jan Early - Dec Late	100	Bruns Dry Stock
Holdheides Steers	Finishing steer (beef)	90	1,100	Jan Early - Dec Late	100	Holdheide pond
Hog BN Calves	Calf (dairy)	80	150	Jan Early - Dec Late	100	Calves Schlarmans
Home Dry Cows 2	Dry cow (dairy)	12	1,400	Jan Early - Dec Late	100	Home Pond
Hoyings Heifers 2	Breeding heifer (dairy)	35	1,100	Jan Early - Dec Late	100	Home Pond
Bruns Heifers 2	Breeding heifer (dairy)	15	1,100	Jan Early - Dec Late	100	Home Pond

(1) Number of Animals is the average number of animals that are present in the production facility at any one time.
(2) If Manure Collected is less than 100%, this indicates that the animals spend a portion of the day outside of the production facility or that the production facility is unoccupied one or more times during the confinement period.

3: P8292410
Description: Page from the farm's CNMP that shows manure storage capacity, type of storage, days of storage and average number of animals on site.
Location: Main office.
Camera Direction: Down.
Date/Time: 8/29/2017/10:13am

4: P8292411
Description: Wet distilled grains and bean meal in the commodity barn. Runoff flows south towards the corn field.
Location: Commodity barn.
Camera Direction: East.
Date/Time: 8/29/2017/10:20am

5: P8292412
Description: Area west of barns. Runoff from this area flows south towards the corn field.
Location: Commodity barn.
Camera Direction: South.
Date/Time: 8/29/2017/10:21am

FOIA Ex. 6 (Personal Priacy) Farms
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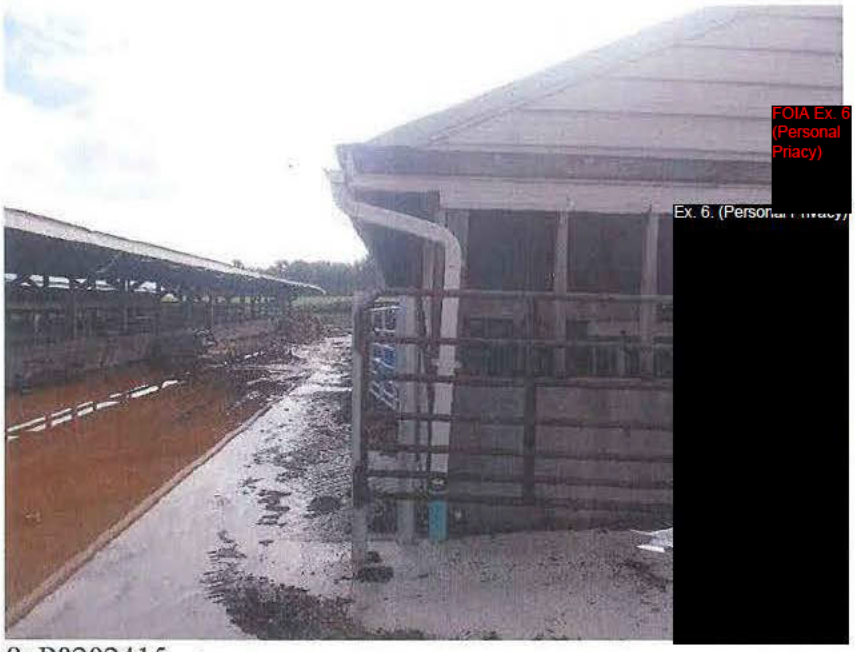
6: P8292413
Description: Bulk bin west of Calves Barn 2.
Location: Calves Barn 2.
Camera Direction: Northeast.
Date/Time: 8/29/2017/10:21am

7: P8292414
Description: Water backup on the concrete pad that leads to the lagoon.
Location: Northwest corner of the Calves Barn 2.
Camera Direction: East.
Date/Time: 8/29/2017/10:22am



8: P8292415
Description: Solid manure outside of the Calves Barn 2. Drains towards the lagoon.
Location: Northwest corner of the Calves Barn 2.
Camera Direction: East.
Date/Time: 8/29/2017/10:22am

9: P8292416
Description: Solids stacked between barns.
Location: North of Calves Barn 2.
Camera Direction: East.
Date/Time: 8/29/2017/10:24am

10: P8292417
Description: Solids on the side of the Heifers Barn.
Location: Northwest corner of the Calves Barn 2.
Camera Direction: Northwest.
Date/Time: 8/29/2017/10:25am

11: P8292418
Description: Bulk bin with spilled feed around it. .
Location: Bulk bins.
Camera Direction: West.
Date/Time: 8/29/2017/10:25am

12: P8292419
Description: Pooled water and silage from cleaning the equipment in front of the garage.
Location: North of the Bulk bins.
Camera Direction: East.
Date/Time: 8/29/2017/10:26am

13: P8292420
Description: Old silo not in use anymore, with a hole at the bottom of it.
Location: Old barn.
Camera Direction: Northeast.
Date/Time: 8/29/2017/10:28am

14: P8292421
Description: Spillage by silo and bulk bin west of the Old barn.
Location: Old barn.
Camera Direction: South.
Date/Time: 8/29/2017/10:28am

15: P8292422
Description: Concrete pad between Old barn and the Heifers barn.
Location: Northwest corner of the Heifers barn.
Camera Direction: South.
Date/Time: 8/29/2017/10:31am

16: P8292423
Description: Hay bales in the Hay barn.
Location: Hay barn.
Camera Direction: Northeast.
Date/Time: 8/29/2017/10:32am

17: P8292424
Description: Pad on the east side of the Heifers barn where the scraped manure is pushed towards the lagoon.
Location: Northeast corner of the Heifers barn.
Camera Direction: South.
Date/Time: 8/29/2017/10:34am

18: P8292425
Description: The Lagoon where most runoff from the production area flows to.
Location: Northwest corner of the Lagoon.
Camera Direction: South.
Date/Time: 8/29/2017/10:35am

19: P8292426
Description: The Lagoon where most runoff from the production area flows to.
Location: Northwest corner of the Lagoon.
Camera Direction: South.
Date/Time: 8/29/2017/10:35am

20: P8292427
Description: The Lagoon where most runoff from the production area flows to.
Location: Northwest corner of the Lagoon.
Camera Direction: Southeast.
Date/Time: 8/29/2017/10:35am

21: P8292428
Description: Very little free board at the Lagoon at the time of inspection (5-6 inches).
Location: Northeast corner of the Lagoon.
Camera Direction: West.
Date/Time: 8/29/2017/10:39am

22: P8292429
Description: Haylage bags along the waterway. Bags are place approximately 20ft from the waterway.
Location: East of the Lagoon.
Camera Direction: South.
Date/Time: 8/29/2017/10:40am

23: P8292430
Description: Approximately 0.5ft of water in the waterway on the east side of facility.
Location: Waterway.
Camera Direction: Down.
Date/Time: 8/29/2017/10:42am

24: P8292431
Description: The waterway was covered in vegetation. Water was present underneath the vegetation.
Location: Waterway.
Camera Direction: South.
Date/Time: 8/29/2017/10:42am

25: P8292432
Description: Push out from the barns to Lagoon.
Location: East of the Lagoon.
Camera Direction: West.
Date/Time: 8/29/2017/10:44am

26: P8292433
Description: Northeast corner of the Lagoon and the automatic milking room and Manure Press building in the background.
Location: Northeast corner of the Lagoon.
Camera Direction: Southwest.
Date/Time: 8/29/2017/10:44am

27: P8292434
Description: Recently filled bags of silage.
Location: East of the Dairy Cows barn.
Camera Direction: South.
Date/Time: 8/29/2017/10:46am

28: P8292435
Description: Recently filled bags of silage.
Location: East of the Dairy Cows barn.
Camera Direction: South.
Date/Time: 8/29/2017/10:46am

29: P8292436
Description: End of silage bags where nitrogen gas coming out of them had turned the grass yellow. There was also spilled silage around the bags and bag openings.
Location: East of the Dairy Cows barn.
Camera Direction: Southeast.
Date/Time: 8/29/2017/10:48am

30: P8292437
Description: Storage tank for water from the plate coolers.
Location: Dairy Cows barn.
Camera Direction: South.
Date/Time: 8/29/2017/10:51am

31: P8292438
Description: Manure ran out of the Manure Press barn when the pit became so full.
Location: Manure Press barn.
Camera Direction: West.
Date/Time: 8/29/2017/10:52am

32: P8292439
Description: Pit in the Manure Press barn.
Location: Manure Press barn.
Camera Direction: Down.
Date/Time: 8/29/2017/10:53am

33: P8292440
Description: Grassed area in front of the Manure Press sloped towards the lagoon.
Location: Manure Press barn.
Camera Direction: NorthEast.
Date/Time: 8/29/2017/10:53am

34: P8292441
Description: Pit (45,000 gallons) on the North side of the Dairy Cows barn where manure runoff from the barn is accumulated before being pumped into the lagoon.
Location: Next to the Manure Press.
Camera Direction: Down.
Date/Time: 8/29/2017/10:54am

35: P8292442
Description: Solids from the press belt accumulated over a year's time.
Location: Manure Press barn.
Camera Direction: Southwest.
Date/Time: 8/29/2017/10:56am

36: P8292443
Description: A years worth of solids buildup from the press belt. Pile of manure is open to precipitation.
Location: Manure Press barn.
Camera Direction: Southwest.
Date/Time: 8/29/2017/10:56am

37: P8292444
Description: Reception pit and pumps.
Location: Manure Press barn.
Camera Direction: South.
Date/Time: 8/29/2017/10:57am

38: P8292445
Description: Grassed area east of the solids buildup sloped towards the lagoon and waterway.
Location: Manure Press.
Camera Direction: East.
Date/Time: 8/29/2017/10:58am

39: P8292446
Description: Small pile of solids which fell off the belt from the Manure Press barn.
Location: Manure Press barn.
Camera Direction: East.
Date/Time: 8/29/2017/11:00am

40: P8292447
Description: Haylage bag connection.
Location: Haylage bags.
Camera Direction: West.
Date/Time: 8/29/2017/11:02am

41: P8292448
Description: Grass on the east of the haylage bags between haylage bags and the waterway.
Location: Between the haylage bags and the waterway.
Camera Direction: West.
Date/Time: 8/29/2017/11:07am

42: P8292449
Description: Open hay/straw bag. Hay is spoiled and will be land applied.
Location: Haylage bags.
Camera Direction: South.
Date/Time: 8/29/2017/11:09am .

43: P8292450
Description: Open hay/straw bag close to the waterway.
Location: South end of the Haylage bags.
Camera Direction: Southeast.
Date/Time: 8/29/2017/11:10am

44: P8292451
Description: Wrapped wheat bags close to the waterway.
Location: South of the production area by the waterway.
Camera Direction: North.
Date/Time: 8/29/2017/11:10am

45: P8292452
Description: Wrapped wheat bags close to the waterway.
Location: South of the production area by the waterway.
Camera Direction: South.
Date/Time: 8/29/2017/11:16am

46: P8292453
Description: Open bag of wrapped wheat close to the waterway.
Location: South of the production area by the waterway.
Camera Direction: South.
Date/Time: 8/29/2017/11:17am

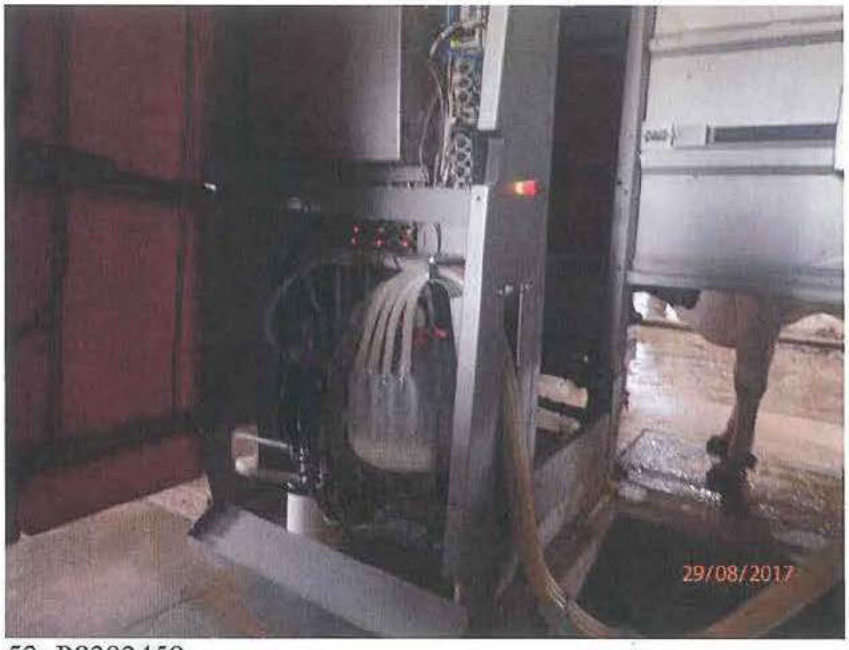
47: P8292454
Description: Leftover/uneaten silage stacked and waiting to be hauled on the east end of the Dairy Cows barn. Stack is open to precipitation.
Location: Dairy Cows barn.
Camera Direction: Northwest.
Date/Time: 8/29/2017/11:21am

48: P8292455
Description: Leftover/uneaten silage stacked on the east end of the Dairy Cows barn and waiting to be hauled..
Location: Dairy Cows barn.
Camera Direction: Southwest.
Date/Time: 8/29/2017/11:23am

49: P8292456
Description: New downspouts on the south side of the Dairy Cows barn that end up in the ditch.
Location: Dairy Cows barn.
Camera Direction: West.
Date/Time: 8/29/2017/11:24am

50: P8292457
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: Northwest?
Date/Time: 8/29/2017/11:26am

51: P8292458
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: NorthWest.
Date/Time: 8/29/2017/11:26am



52: P8292459
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: Northwest.
Date/Time: 8/29/2017/11:27am

53: P8292460
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: Northwest.
Date/Time: 8/29/2017/11:29am

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54: P8292461
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: Northwest.
Date/Time: 8/29/2017/11:29am

55: P8292462
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: Northwest.
Date/Time: 8/29/2017/11:29am

56: P8292463
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:30am

57: P8292464
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:30am

58: P8292465
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:30am

59: P8292466
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:30am

60: P8292467
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:30am

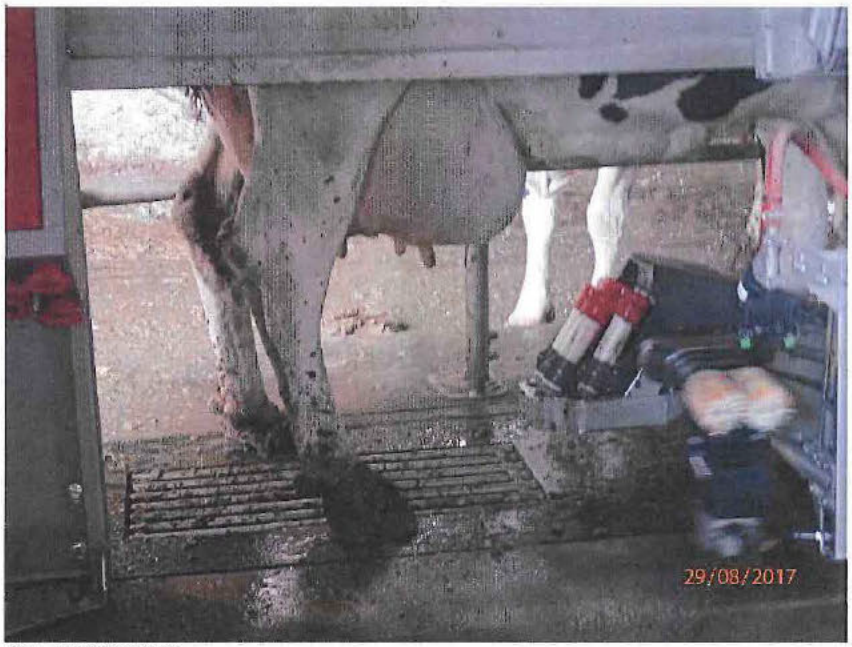
61: P8292468
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:30am

62: P8292469
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:30am

63: P8292470
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:30am

64: P8292471
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:30am

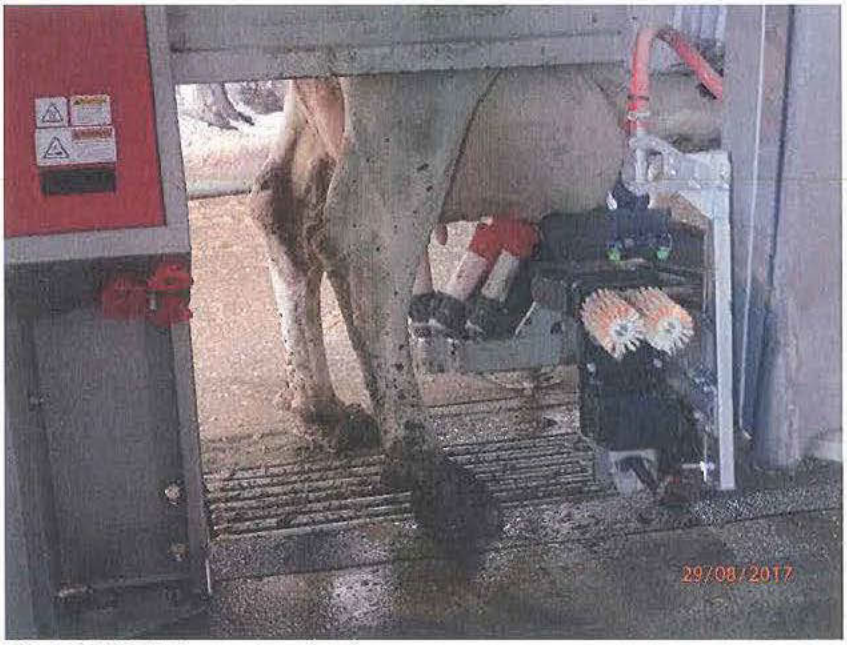
65: P8292472
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:30am



66: P8292473
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:30am

67: P8292474
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:30am

68: P8292475
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:30am

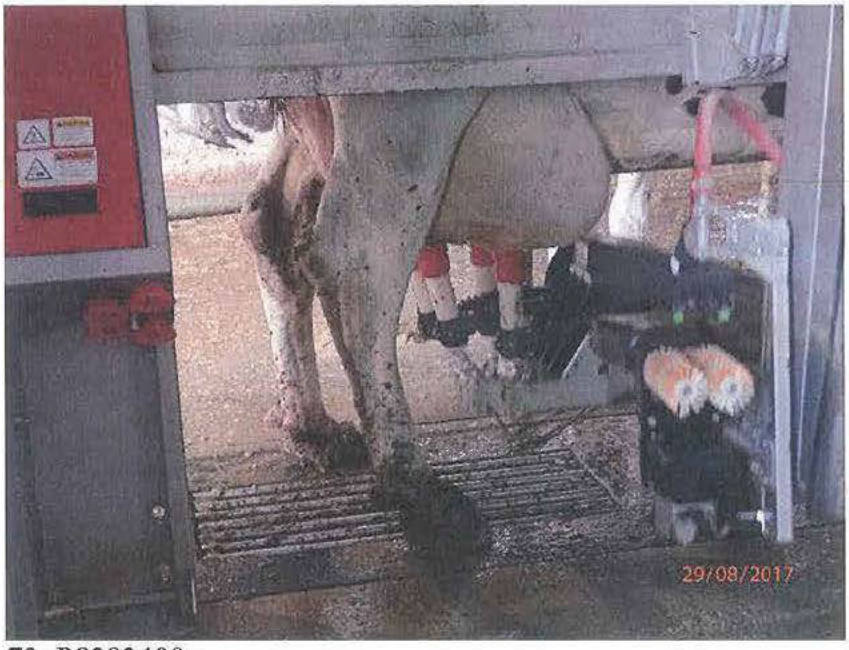


69: P8292476
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:30am

70: P8292477
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:30am

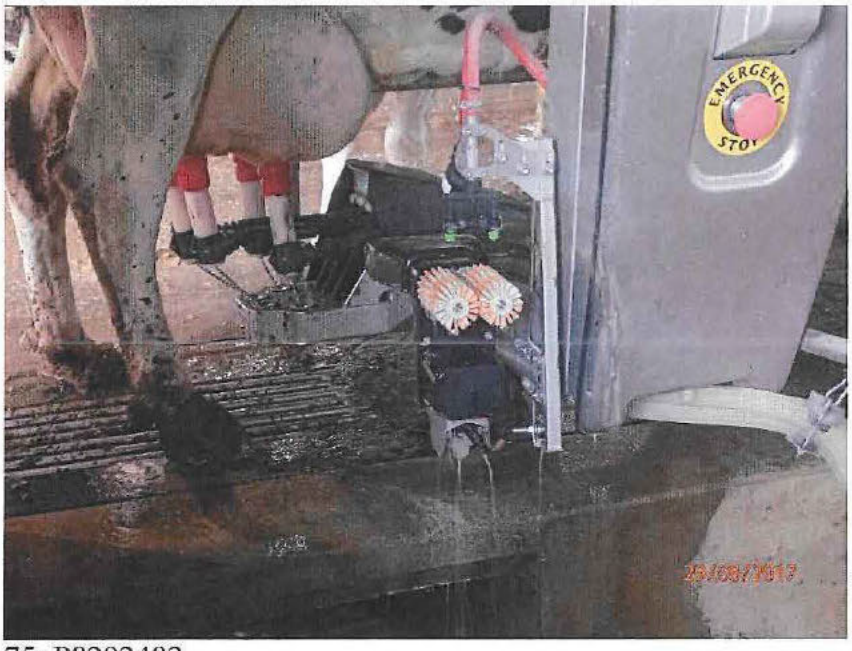
71: P8292478
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:30am

72: P8292479
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:31am



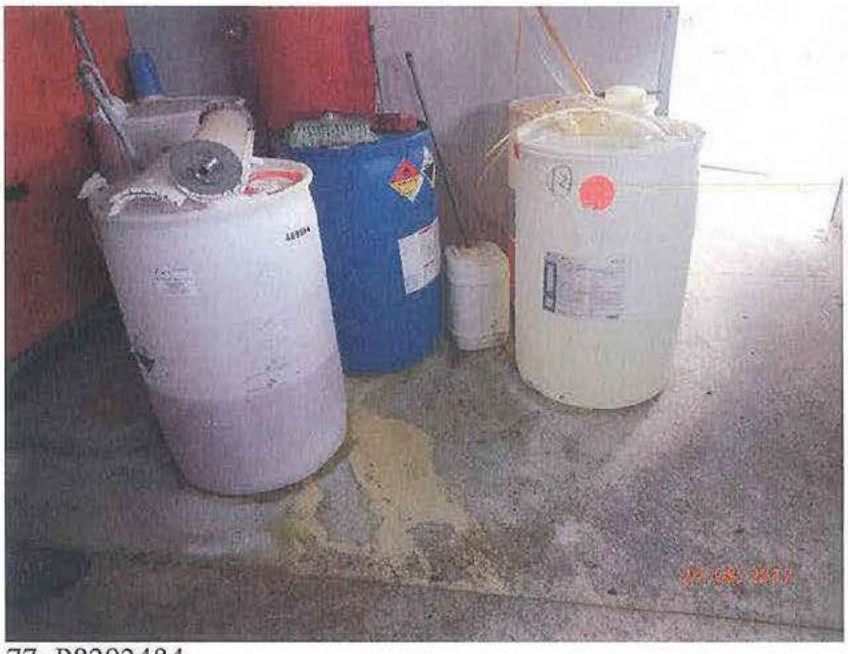
73: P8292480
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:31am

74: P8292481
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:31am



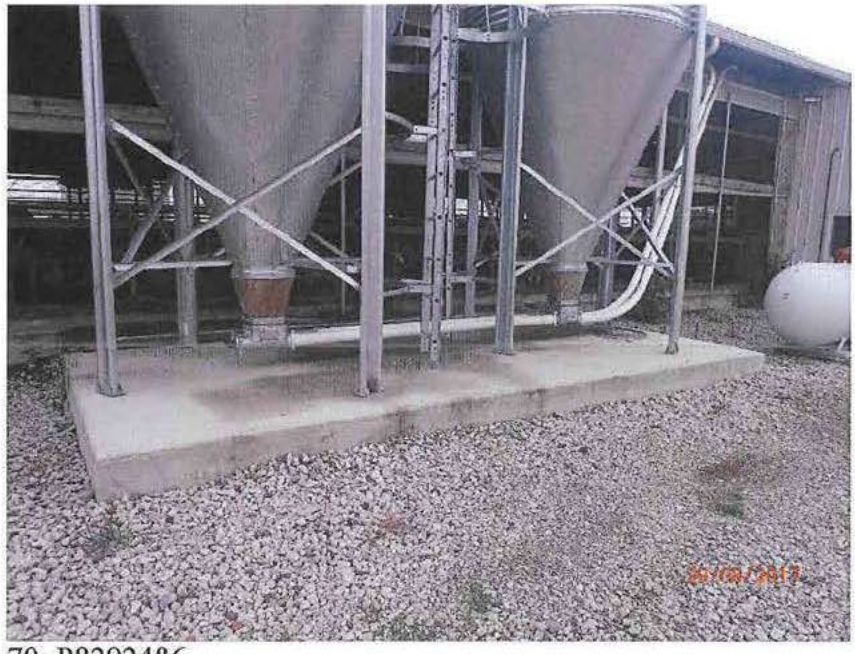
75: P8292482
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:31am

76: P8292483
Description: Milking robots. No workers needed.
Location: Dairy Cows barn.
Camera Direction: Northeast.
Date/Time: 8/29/2017/11:31am



77: P8292484
Description: Chemical storage area.
Location: Dairy Cows barn.
Camera Direction: Northwest.
Date/Time: 8/29/2017/11:32am

78: P8292485
Description: Floor drain in the chemical storage area. All drains go to the lagoon.
Location: Dairy Cows barn.
Camera Direction: Down.
Date/Time: 8/29/2017/11:32am



79: P8292486
Description: Feed bins by the Dairy Cows barn with no feed spilled around them.
Location: Dairy Cows barn.
Camera Direction: Northeast.
Date/Time: 8/29/2017/11:34am

80: P8292487
Description: Runnoff from the Dairy Cows barn drains towards the lagoon.
Location: Dairy Cows barn.
Camera Direction: South.
Date/Time: 8/29/2017/11:40am

81: P8292488
Description: Runnoff from the west side of the Dairy Cows barn drains towards the corn field to the south of facility.
Location: Dairy Cows barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:40am

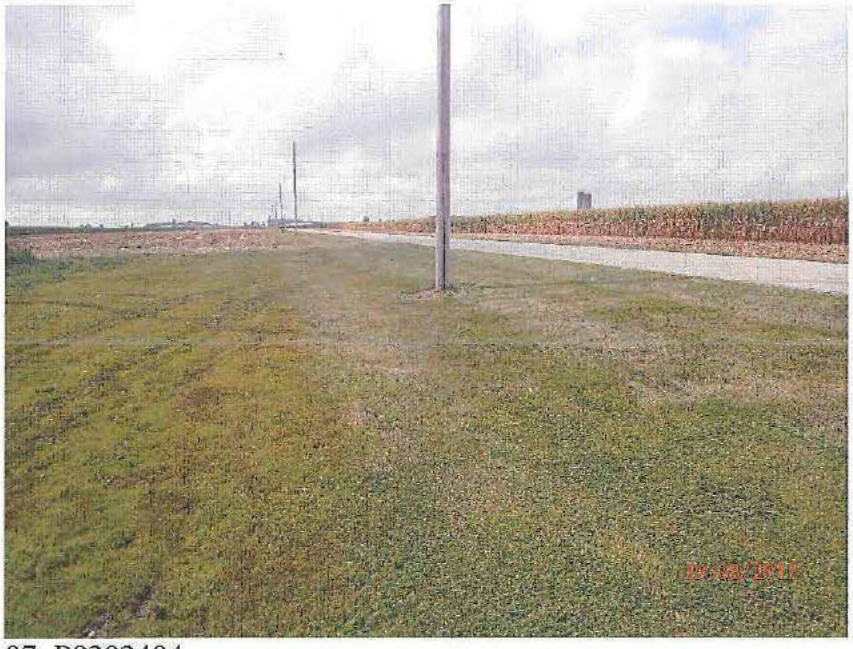
82: P8292489
Description: Pooling water between the silage on the west side and the Dairy Cows barn. This area drains towards the corn field on the south of the facility.
Location: Silage bags on the west.
Camera Direction: Down.
Date/Time: 8/29/2017/11:41am

83: P8292490
Description: Pooling water next to the silage bags on the west side. Discoloration is silage leachate in the precipitation water.
Location: Silage bags on the west.
Camera Direction: Northwest.
Date/Time: 8/29/2017/11:42am

84: P8292491
Description: Open silage bag on the west side.
Location: Silage bags on the west.
Camera Direction: East.
Date/Time: 8/29/2017/11:44am

85: P8292492
Description: Pooled water between the silage bags and FOIA Ex. 6 (Personal Priacy) Road that drains towards the road.
Location: Silage bags on the west.
Camera Direction: North.
Date/Time: 8/29/2017/11:44am

86: P8292493
Description: Drain on the side of the road that drains the area between the silage and the road.
Location: [redacted] road in front of the facility.
Camera Direction: North.
Date/Time: 8/29/2017/11:45am



87: P8292494
Description: Grassed area on the west side of the facility by [redacted] Road.
Location: [redacted] road in front of the facility.
Camera Direction: South.
Date/Time: 8/29/2017/11:45am

88: P8292495
Description: Brown nitrogen gas coming out of recently filled silage bag.
Location: Silage bags on the west.
Camera Direction: Southwest.
Date/Time: 8/29/2017/11:47am

89: P8292496
Description: Brown nitrogen gas coming out of recently filled silage bag.
Location: Silage bags on the west.
Camera Direction: South.
Date/Time: 8/29/2017/11:48am

90: P8292497
Description: Brown nitrogen gas coming out of recently filled silage bag.
Location: Silage bags on the west.
Camera Direction: South.
Date/Time: 8/29/2017/11:48am

91: P8292498
Description: Brown nitrogen gas coming out of recently filled silage bag.
Location: Silage bags on the west.
Camera Direction: South.
Date/Time: 8/29/2017/11:48am

92: P8292499
Description: Brown nitrogen gas coming out of recently filled silage bag.
Location: Silage bags on the west.
Camera Direction: South.
Date/Time: 8/29/2017/11:48am

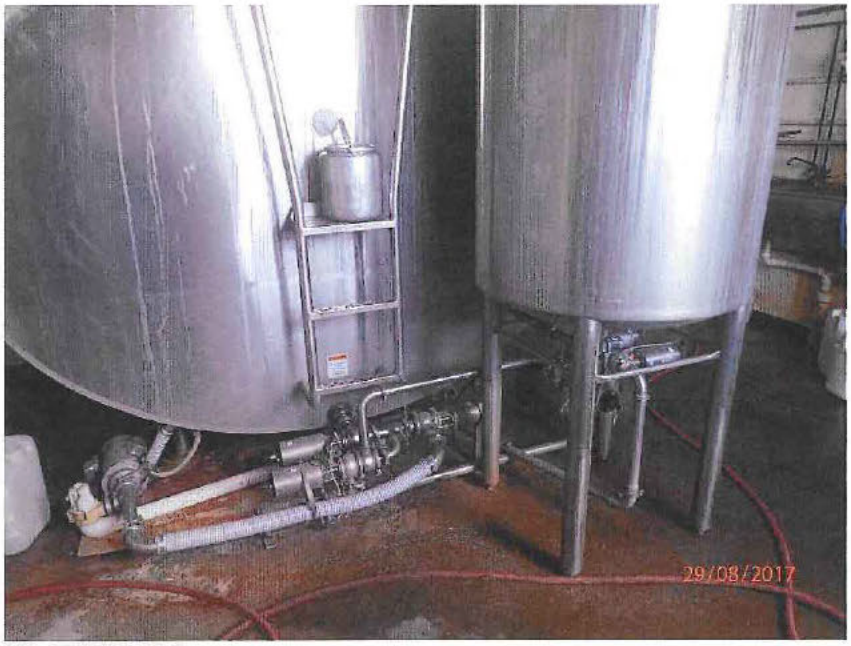
93: P8292501
Description: Solids outside of the composting barn and open to precipitation.
Location: Composting barn.
Camera Direction: East.
Date/Time: 8/29/2017/11:56am

94: P8292502
Description: Compost pile.
Location: Composting barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:57am

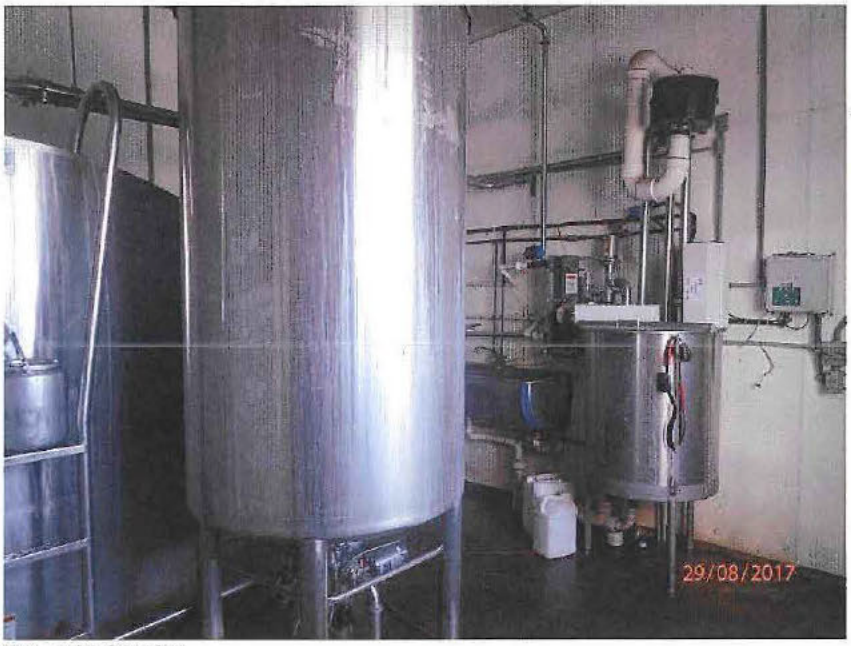
95: P8292503
Description: Compost pile. A few bones can be seen in the compost pile.
Location: Composting barn.
Camera Direction: Northwest.
Date/Time: 8/29/2017/11:57am

96: P8292504
Description: Pressed manure on right side of Composting barn.
Location: Composting barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:58am

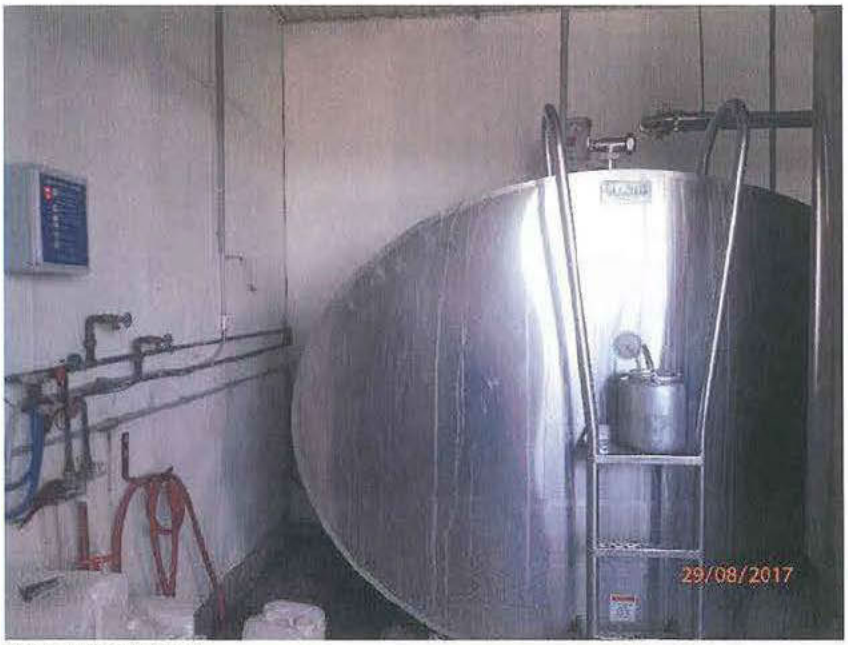
97: P8292505
Description: End of belt that comes from the Manure Press.
Location: Composting barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:58am



98: P8292506
Description: Milk tanks.
Location: Calves 1 barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:59am



99: P8292507
Description: Milk tanks.
Location: Calves 1 barn.
Camera Direction: Northeast.
Date/Time: 8/29/2017/11:59am

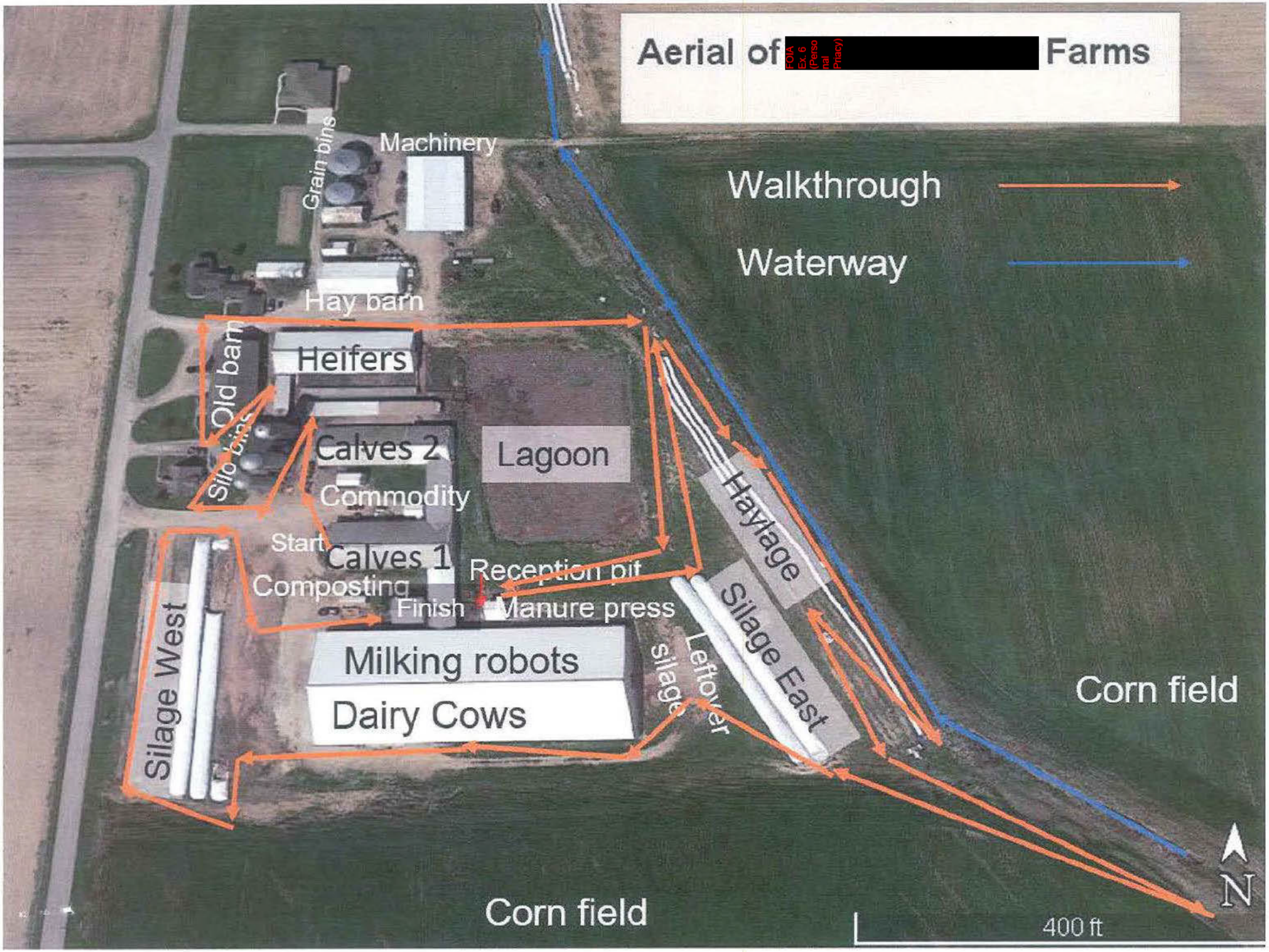


100: P8292508
Description: Milk tank.
Location: Calves 1 barn.
Camera Direction: North.
Date/Time: 8/29/2017/11:59am

101: RIMG1902
Description: Tile drain in the waterway that drains the corn field south of the facility. Very little flow at the time of the inspection.
Location: Waterway on the Southeast corner of the facility.
Camera Direction: Down.
Date/Time: 8/29/2017/10:12am

102: RIMG1903
Description: Tile drain in the waterway that drains the corn field south of the facility. Very little flow at the time.
Location: Waterway on the Southeast corner of the facility.
Camera Direction: Down.
Date/Time: 8/29/2017/10:12am

Attachment 3


Aerial of FOIA Ex. 6 (Personal Privacy) Farms
Machinery
Grain bins
Walkthrough
Waterway
Hay barn
Old barn
Heifers
Silo bins
Calves 2
Lagoon
Commodity
Haylage
Start
Calves 1
Reception pit
Composting
Finish
Manure press
Silage West
Milking robots
Dairy Cows
Leftover silage
Silage East
Corn field
Corn field
N
400 ft